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January 12, 2024

VIA ECF

Hon. Cathy Seibel
United States District Judge
300 Quarropas St.
White Plains, NY 10601-4150

Re: Graham v. Vassar College, Case No. 7:23-cv-07692-CS

Dear Judge Seibel:

The Parties, Plaintiffs Wendy Graham, Mia Mask, Maria Hohn, Cindy Schwarz and Debra Zeifman (collectively, "Plaintiffs") and Defendant Vassar College, submit this Joint Proposal in response to the Court's Memo Endorsement dated January 2, 2023.

Plaintiffs have determined to file a Second Amended Complaint, and the Parties have agreed to the below proposed filing dates with respect to the filing of both a Second Amended Complaint and the filing and briefing of Defendant's Motion to Dismiss:

- Plaintiffs' Second Amended Complaint to be filed by January 30, 2024;
- Defendant shall submit its Motion to Dismiss and supporting papers by February 13, 2024;
- Plaintiffs' Opposition is due on March 5, 2024; and
- Defendant's Reply is due on March 19, 2024.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Camille A. Olson

Camille A. Olson

CC: Counsel of Record (via ECF)

Schedule approved. Second Amended Complaint due 1/30/24.
Motion to dismiss due 2/13/24. Opposition due 3/5/24. Reply
due 3/19/24.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

1/12/24

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